

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

ATHENA LUNDBERG, BROOKE MARRIN  
a/k/a BROOKE BANX, CORA SKINNER,  
DENISE MILANI a/k/a DENISE TRLICA,  
HILLARY FISHER VINSON a/k/a HILLARY  
HEPNER, IRINA VORONINA, KIMBERLY  
COZZENS, JAIME EDMONDSON-  
LONGORIA, JENNIFER ARCHULETA,  
JESSICA BURCIAGA, JESSICA  
ROCKWELL, MALU LUND, a/k/a MASHA  
LUND, LUCY PINDER, PAOLA CANAS,  
SARA UNDERWOOD and TIFFANY TOTH  
GRAY,

Plaintiffs,

- against -

ONE THREE FIVE, INC. and ALBERT  
BORTZ,

Defendants.

Case No. 19-cv-692-CRE

**NOTICE OF MOTION FOR DEFAULT**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of John V. Golaszewski, Esq., counsel for plaintiffs ATHENA LUNDBERG, BROOKE MARRIN a/k/a BROOKE BANX, CORA SKINNER, DENISE MILANI a/k/a DENISE TRLICA, HILLARY FISHER VINSON a/k/a HILLARY HEPNER, IRINA VORONINA, KIMBERLY COZZENS, JAIME EDMONDSON-LONGORIA, JENNIFER ARCHULETA, JESSICA BURCIAGA, JESSICA ROCKWELL, MALU LUND, a/k/a MASHA LUND, LUCY PINDER, PAOLA CANAS, SARA UNDERWOOD and TIFFANY TOTH GRAY (collectively, “Plaintiffs”), the Certificate from the Clerk of Court stating that no answer has been filed and noting the default of defendant ONE THREE FIVE, INC., the declaration of Plaintiffs’ expert, Stephen Chamberlin, which sets forth the damages claimed in this action, the Proposed Default Judgment, and upon all

other papers and proceedings hitherto had herein, Plaintiffs will move this Court, Honorable Cynthia Reed Eddy, at the United States District Court for the Western District of New York located at the Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Pittsburgh, PA 15219, as soon as counsel may be heard, for a default judgment against defendant ONE THREE FIVE, INC., pursuant to Rule 55 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York  
February 7, 2020

**THE CASAS LAW FIRM, P.C.**

By: /s/ John V. Golaszewski  
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CERTIFICATE OF SERVICE

I hereby certify that on this 7<sup>th</sup> day of February, 2020, the foregoing was electronically filed with the U.S. District Court Clerk, Western District of Pennsylvania, by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ John V. Golaszewski

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